

1 DEBORAH CONNOR, Acting Chief
Money Laundering and Asset Recovery Section (MLARS)
2 MARY BUTLER
Chief, International Unit
3 WOO S. LEE
Deputy Chief, International Unit
4 JONATHAN BAUM, Senior Trial Attorney
BARBARA LEVY, Trial Attorney
5 Criminal Division
United States Department of Justice
6 1400 New York Avenue, N.W., 10th Floor
Washington, D.C. 20530
7 Telephone: (202) 514-1263
Email: Woo.Lee@usdoj.gov

8 NICOLA T. HANNA
United States Attorney
9 LAWRENCE S. MIDDLETON
Assistant United States Attorney
10 Chief, Criminal Division
STEVEN R. WELK
11 Assistant United States Attorney
Chief, Asset Forfeiture Section
12 JOHN J. KUCERA (CBN: 274184)
MICHAEL SEW-HOY (CBN: _____)
13 Assistant United States Attorneys
Asset Forfeiture Section
14 312 North Spring Street, 14th Floor
Los Angeles, California 90012
15 Telephone: (213) 894-3391/(213) 894-2727
Facsimile: (213) 894-7177
16 Email: John.Kucera@usdoj.gov

17 Attorneys for Plaintiff
UNITED STATES OF AMERICA
18

19 UNITED STATES DISTRICT COURT

20 FOR THE CENTRAL DISTRICT OF CALIFORNIA

21 UNITED STATES OF AMERICA,

22 Plaintiff,

23 v.

24 CERTAIN RIGHTS TO AND INTERESTS
25 IN SHARES OF SERIES D PREFERRED
26 STOCK IN PALANTIR TECHNOLOGIES,

27 Defendants.
28

No. CV 17-4446 DSF (PLAx)

STIPULATION AND JOINT REQUEST TO
CONTINUE HEARINGS ON GOVERNMENT'S
MOTION TO STAY AND CLAIMANT'S
MOTION TO DISMISS AND STRIKE

Current Dates:

Stay - 6/11/18

Dismiss and Strike - 7/9/18

Proposed New Dates:

Stay - 7/16/18;

Dismiss and Strike - 8/13/18

1 By the signatures of their counsel hereunder, the United States
2 and Claimant Tarek Obaid ("Claimant") respectfully stipulate and
3 request that the United States' Motion for Order Staying Civil
4 Forfeiture Proceedings for All Purposes Except the Filing of Timely
5 Claims and Answers ("Motion to Stay"), which is currently noticed for
6 hearing on June 11, 2018, be re-noticed for July 16, 2018, and
7 Claimant's Motion to Dismiss Verified Complaint In Rem Pursuant to
8 Rules 12(B)(2), 12(B)(3) and 12(B)(6) and Motion to Strike Pursuant
9 to Rule 12(F) ("Motion to Dismiss and Strike"), which is currently
10 set for July 9, 2018, be continued to August 13, 2018.

11 WHEREAS, this action was filed on June 15, 2017 against the
12 Defendant Asset;

13 WHEREAS, Claimant filed a Verified Claim and Statement of
14 Interest in this action asserting his interest in the Defendant Asset
15 on July 19, 2017;

16 WHEREAS, Claimant filed a Motion to Dismiss and Strike on
17 October 18, 2017;

18 WHEREAS, the United States filed a Motion to Stay the instant
19 action on November 8, 2017, which Claimant filed an opposition to on
20 November 20, 2017;

21 WHEREAS, the Court on March 19, 2018, directed that the United
22 States file its opposition to Claimant's Motion to Dismiss and Strike
23 by June 6, 2018, and Claimant's reply by June 19, 2018;

24 WHEREAS, the Court also directed the United States file its
25 reply to Claimant's opposition to the United States' Motion to Stay
26 on or before May 22, 2018;

27 WHEREAS, counsel for the parties met and conferred
28 telephonically on May 7, 2018, and have continued to confer via

1 electronic mail since that time, to further discuss the possibility
2 of addressing the United States' pending Motion to Stay and
3 Claimant's pending Motion to Dismiss and Strike without the need for
4 court intervention;

5 NOW, THEREFORE, the United States and Claimant hereby stipulate
6 and agree that:

7 (1) By June 25, 2018, the United States shall file its reply to
8 Claimant's opposition to the United States' Motion to Stay. The
9 hearing on the United States' Motion to Stay shall be continued from
10 June 11, 2018, to July 16, 2018, or until such other time as the
11 Court orders;

12 (2) By July 13, 2018, the United States shall file its
13 opposition to Claimant's Motion to Dismiss and Strike. By July 30,
14 2018, Claimant shall file its reply to the United States'

15 / / /

16 / / /

1 opposition. The hearing on Claimant's Motion to Dismiss and Strike
2 shall be continued from July 9, 2018, to August 13, 2018, or until
3 such other time as the Court orders.

4
5 Dated: May 18, 2018

Respectfully submitted,

6 DEBORAH CONNOR
7 Acting Chief, MLARS

8 NICOLA T. HANNA
9 United States Attorney

10 /s/Woo S. Lee

11 JOHN J. KUCERA
12 JONATHAN GALATZAN
Assistant United States Attorneys

13 WOO S. LEE
14 Deputy Chief, MLARS
15 JONATHAN BAUM
16 BARBARA LEVY
Trial Attorneys, MLARS

17 Attorneys for Plaintiff
UNITED STATES OF AMERICA

18
19 Dated: May 18, 2018

/s/ (per confirmation)

20 David B. Rivkin, Jr.
21 Jonathan R. Barr
Jonathan B. New

22 Attorneys for Claimant
23 TAREK OBAID
24
25
26
27
28